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Attorneys for Petitioner Kabushiki Kaisha Too Marker Products, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**KABUSHIKI KAISHA TOO MARKER  
PRODUCTS, INC.**, a foreign corporation  
existing under the laws of Japan,

Petitioner,

Case No. 6:19-cv-00237-MK

**STIPULATED ORDER ON MOTION  
TO COMPEL ARBITRATION**

v.

**IMAGINATION INTERNATIONAL, INC.**,  
an Oregon corporation, **JOHN DARLAND**,  
**HILLARY DARLAND**, and **TAKUMA  
TAKAHARA**, as shareholders of  
**IMAGINATION INTERNATIONAL, INC.**,

Respondents.

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Petitioner Kabushiki Kaisha Too Marker Products, Inc. ("TMP") and Respondents, and each of them, by and through their respective counsel, hereby stipulate as follows:

1. The stipulating parties agree to arbitrate all current claims between each other including all current claims arising out of the exclusive distribution agreement, out of the business relationship between TMP and Imagination International, Inc. and/or out of the corporate

relationship between the parties. All current disputes between the parties, including all claims raised in the federal actions, must be pursued in arbitration, if at all;

2. That arbitration shall take place in Oregon, through the ICC, applying Oregon law;

3. Respondents shall promptly dismiss Defendant Ishii in *Imagination International, Inc., et al. v. Kabushiki Kaisha Too Marker Products, Inc., et al.*, Case No. 6:19-cv-00203-MK. Respondents agree that no claims will be brought against him by the Respondents;

4. Aside from the claim against Defendant Ishii, which will be dismissed, the parties shall file a stipulated motion to stay the claims raised in *Imagination International, Inc., et al. v. Kabushiki Kaisha Too Marker Products, Inc., et al.*, Case No. 6:19-cv-00203-MK, pending arbitration.

5. The parties disagree about the appropriate number of arbitrators, and will address that disagreement in the arbitration.

6. This action is hereby DISMISSED without fees and costs to any party.

IT IS SO STIPULATED.

LANE POWELL PC

DATED: June 7, 2019

By s/ Hans N. Huggler

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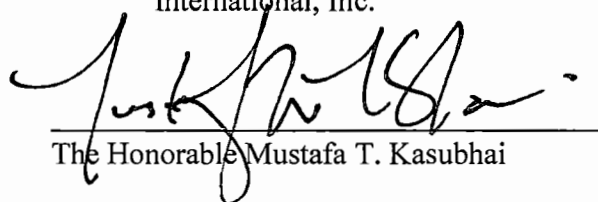
DATED: June 7, 2019

By s/ Donald J. Churnside

Donald J. Churnside, OSB No. 791876  
Nicholas R. Balthrop, OSB No. 153110  
Telephone: 541.343.8060  
Attorneys for Respondent Imagination  
International, Inc.

IT IS SO ORDERED.

DATED: 6/13/19

  
The Honorable Mustafa T. Kasubhai

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